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Leah Evison, Ph.D.
U.S. EPA Project Manager
U.S. EPA Region 5 (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3507

May 7, 2010

RE: FWA/Brook (SOU) Inspection Requirements
Fields Brook Superfund Site, Ashtabula, Ohio

Dear Ms. Evison:

In the Fields Brook Post-Closure Operations, Maintenance and Monitoring Plan, Table 2-1 (attached) requires quarterly inspections of both the landfill and of the Fields Brook floodplain for 30 years. The following is information to support our request that the floodplain inspections for Exposure Units (EUs) 1, 2, 3, 4, 5 and 7 be deemed to be no longer necessary. We will continue quarterly inspections of EUs 6 and 8.

Item 2.A.7 of the Fields Brook Statement of Work, dated April 1999 (stated paragraph attached), required that the floodplain "cover areas" be inspected and monitored, without providing a timeframe. The same paragraph goes on to state that operations and maintenance of the on-site Landfill is required for a period of 30-years. Other areas in the SOW indicate that a suggested time period for monitoring the brook may be 5 years. The inspections for the floodplain and the brook have been performed for seven years. Minimal maintenance of erosion areas was initially required, with no maintenance actions required since 2004. We would like to discontinue the inspections of all the floodplain and brook areas except for EU6 and EU8. We will continue quarterly inspections of EU6 and EU8 due to construction as recent as 2009 in EU8.

Please contact me at 865-691-5052 or Valerie@demaximis.com if you have any questions or require further information on this request.

Sincerely,
de maximis, inc.

Valerie A. Rule, P.E.
Project Engineer

Cc: Bob Rule, de maximis, inc.
Project Files 3075-03

Table 2-1
Summary of Post Closure Site Monitoring Activities
Fields Brook Superfund Site

Activity	PC/OM&M Plan Section	Frequency	Comments
Landfill Inspection and Maintenance	Section 6	Monthly for first year Quarterly for years 2 to 30	Inspection of landfill and associated structures and areas as required by the Inspection and Maintenance Log (Table 6-1) and Section 6.
Groundwater Sampling Activities	Section 7	Quarterly for year 1 Semi-annually for years 2 to 5 *	The monitoring network will consist of eight groundwater monitoring wells, FB01 through FB07 and RMI-4D.
Leachate Collection and Leak Detection Systems	Section 6.4	Quarterly for Site Inspections Sample leachate as required by disposal facility	At time of site inspection, schedule a pickup for all leachate collected in LCS and LDS (as needed).
Soil Sampling	Section 7	Annually for PCBs and radionuclides. (Years 1 to 4) 5th year - for nine parameters Review after 5 years	Soil samples will be collected from residential and industrial Floodplain Exposure Units, at locations as defined in Section 7.
Sediment Sampling	Section 7	Annually for PCBs and radionuclides and TAL/TCL (Years 1 to 5) Review after 5 years	Sediment samples will be collected from Sediment Exposure Units, at locations as defined in Section 7.
Reporting	Section 8	Post-Closure Site Monitoring Report: Quarterly Program Summary Report: every 5 years, to coincide with the 5-year review	Analytical data will be reported more frequently, if needed, as defined in Section 7.

* At 5-year intervals, EPA will determine the frequency of sampling based upon available site data.

Inspector Name:_____
Date/Time On Site:_____
Weather:_____
Signature:_____

Table 6-1
Inspection and Maintenance Log
Fields Brook Superfund Site

Feature	Trouble Signs	Status	Problem Location and Description	Action	Date
7. Stormwater Management System a. Perimeter Channels	Buildup of sediment or debris, sloughing, washouts, erosion of vegetative cover, riprap lining displacement or washout, excessive vegetative growth				
b. Spillways	Buildup of sediment greater than 2 inches Check for blockage with light source Buildup of debris, riprap outlets disturbed, damage to spillway				
8. FWA / Brook (SOU) Inspection a. FWA b. Brook	Bare spots, wash outs Erosion, wash outs, sloughing, silting, rip rap integrity				

Leachate Removal:

Date/time				
Volume removed				
Manifest No. (attach original)				
Transporter				
Disposal Facility				
Sample Collected? (yes/no)				
Laboratory used				
Analysis required (attach copy of COC)				

Comments:

cc: OM&M Project Manager

(or chemical stabilization/solidification), and disposal. The excavated material will be temporarily staged and stored above the 100-year flood elevation on one of the industrial properties (within the Fields Brook watershed) with sufficient engineering controls to secure the material from release to the environment.

Regulations related to the dewatering of the soils and sediments prior to consolidation must be met, including 40 CFR 264.228(a)(2), which requires elimination of free liquids by removal or solidification. Thus, it is required that dewatering of the excavated soils and sediments to be landfilled will occur in part to ensure that no free liquids will remain in the soils and sediments prior to disposal into the landfill unit.

7) **Operation, Maintenance and Monitoring of the Remedy**

Respondents shall perform Operation, Maintenance and Monitoring (OM&M) as outlined in the OM&M Plan that is to be prepared as part of this SOW. The OM&M shall include, and not be limited to: inspection and maintenance of cover areas, landfill and erosion controls; groundwater and air monitoring at the on-site landfill (including the establishment of background concentrations); and chemical and radionuclide monitoring of surface soils/sediments. For the on-site landfill, Respondents shall perform OM&M for a minimum of 30 years, and shall perform OM&M beyond 30 years as necessary to ensure that the landfill is securely containing wastes and that there are no unacceptable releases to the environment. See also II(A)(8) below and II(B)4 and II(B)(5) of this SOW.

8) **Post-Cleanup Sampling Requirements**

Respondents shall initiate post-remediation sampling in the SOU to evaluate the remedial action in both the residential and industrial EUs. The sampling program to be conducted by the Respondents will involve the following components:

- 20 sediment samples taken each year, analyzed for total PCBs and radionuclides, at locations in the SOU to be determined each year at U.S. EPA's discretion.

- 20 sediment samples taken each year in the same locations, analyzed for all Target Analyte List (TAL) and Target Compound List (TCL) compounds, at locations in the SOU to be initially determined at U.S. EPA's discretion; as appropriate, the PCB sediment sample locations may possibly be used for the TAL/TCL sample locations.

- review results each year, evaluate final performance monitoring data to assess the need for further sampling and potential changes in sampling locations, and evaluate the need for remedy repairs, in accordance with the Superfund Program's National Contingency Plan regulation (40 CFR Section 300).